

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**MICHAEL T. GIBBS, JR.,** )  
 )  
**vs.** )  
 )  
**DANIEL PRITCHARD, CECILE N.** )  
**CASEY, MERCEDES R. JONES,** )  
**KAYLA PERRY LINEBERRY,** )  
**STEPHEN PAIN and LEIGH STAGGS** )

**No.: 3:13-cv-0350**  
**Judge Campbell**

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**MOTION FOR LEAVE TO FILE DISPOSITIVE MOTION UNDER SEAL  
AND REQUEST EXPEDITED RULING**

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COMES NOW the Defendants Daniel Pritchard, Cecile N. Casey, Mercedes R. Jones, Kayla Perry Lineberry, Amber Bass, Stephen Pain and Leigh Staggs (hereinafter referred to as “Defendants”), by and through their counsel of record, pursuant to Local ECF Guideline 13.4.3, and requests leave of court to file a dispositive motion under seal. Defendants state to the court that the dispositive motion that Defendants have prepared in response to Plaintiff’s Complaint contains medical records and information concerning the Plaintiff’s treatment. It is necessary for these medical documents to be filed under seal pursuant to privacy laws. Additionally, Defendants assert that this request will not prejudice any party, but will in fact protect the privacy of the Plaintiff. Accordingly, due to impending deadlines, Defendants request an expedited review of this motion and its relief requested.

WHEREFORE, Defendants respectfully request that the Court allow Defendants to file their dispositive motion under seal.

Respectfully submitted,

PENTECOST & GLENN, PLLC

By: s/Brittani C. Kendrick  
Brittani C. Kendrick (#29251)  
Attorney for Defendants  
106 Stonebridge Blvd  
Jackson, TN 38305  
(731) 668-5995

**CERTIFICATE OF SERVICE**

This is to certify that I served a copy of this pleading or paper has been served upon each attorney or firm of attorneys appearing of record by mail or by electronic mail via the Court's electronic filing system.

Michael T. Gibbs, Jr.  
716 Woodvale Avenue  
Chattanooga, TN 37411

DATE: This the 7<sup>th</sup> day of May, 2014.

PENTECOST & GLENN, PLLC

By: s/Brittani C. Kendrick  
Brittani C. Kendrick (#29251)  
Attorney for Defendants